

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RYAN BARRON *et al.*, for themselves and a class of others similarly situated,

Plaintiffs,

v.

No.: 1:20-cv-04703-LLS

HELBIZ INC., *et al.*,

Affidavit of Michael Kanovitz

Defendants.

I, Michael Kanovitz, an attorney, state as follows:

1. I am an attorney with the law firm Loevy & Loevy, attorney for Plaintiffs in the above captioned matter, and makes this affidavit upon personal knowledge in support of Plaintiffs' Motion for a Temporary Restraining Order and Preliminary Injunction:

2. Attached and labeled as **Exhibit A** hereto is a true and correct copy of the June 16, 2020, Correspondence (with attachment) from Robert Heim to Michael Kanovitz

3. Attached and labeled as **Exhibit B** hereto is a true and correct copy of the June 25, 2020, Correspondence from Michael Kanovitz to Robert Heim & June 26, 2020 Correspondence from Robert Heim to Michael Kanovitz

4. Attached and labeled as **Exhibit C** hereto is a true and correct copy of the HBZCoin.com Server Location History from securitytrails.com.

5. Attached and labeled as **Exhibit D** hereto is a true and correct copy of the June 30, 2020, Article by Daniel Kuhn published on CoinDesk ([www.coindesk.com](http://www.coindesk.com))

6. Attached and labeled as **Exhibit E** hereto is a true and correct copy of the E-mail correspondence between Michael Kanovitz and Robert Heim from June 30, 2020-July 1, 2020

7. Attached and labeled as **Exhibit F** hereto is a true and correct copy of the Notice “Helbiz Coin Permanent Deactivation and Time-Limited Swap Offer Terms and Conditions” obtained from HBZCoin.com.

8. Attached and labeled as **Exhibit G** hereto is a true and correct copy of the search for “bitcoin” on the official Helbiz Facebook page, showing posts on January 29, 2018, May 15, 2018, April 27, 2018, June 24, 2018, December 31, 2018

9. Attached and labeled as **Exhibit H** hereto is a true and correct copy of the Singapore Accounting and Regulatory Authority bizFiles documents for HBZ Systems PTE. LTD.

10. Attached and labeled as **Exhibit I** hereto is a true and correct copy of the New York State UCC Financing Statements for creditor Quantum Analysis Management LTD and debtor Helbiz, Inc.

11. Attached and labeled as **Exhibit J** hereto is a true and correct copy of what I believe to be the February 2, 2018, Helbiz Mobility System Whitepaper.

12. Attached and labeled as **Exhibit K** hereto is a true and correct copy of a June 6, 2018, Article published on ANSA ([www.ansa.it](http://www.ansa.it))

13. Attached and labeled as **Exhibit L** hereto is a true and correct copy of what I believe to be the June 11, 2018 tweet from Salvatore Palella.

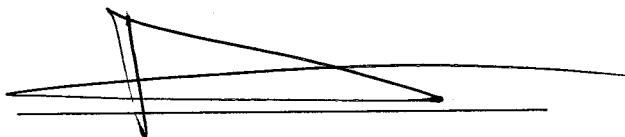
14. Attached and labeled as **Exhibit M** hereto is a true and correct copy an April 26, 2018, Article published on afaritalian.it

15. Attached hereto and labeled as **Exhibit N** is a true and correct copy of July 6, 2020 Declaration of Adriano Marques.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 6, 2020

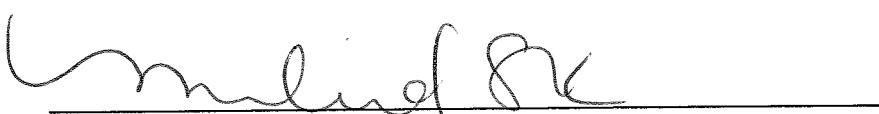
By:



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SUBSCRIBED AND SWORN TO BEFORE ME

On this 6<sup>th</sup> day of July, 2020

A handwritten signature of Melinda EK, consisting of stylized, slanted lines forming the letters 'M', 'e', 'l', 'i', 'n', 'd', 'a', ' ', 'K', 'e', 'k'.

Notary Public

